

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Anastacio Lemus Lopez,

Civil File No. 17-cv-01179 (RHK-KMM)

Plaintiff,

vs.

**DECLARATION OF SHANNON L.  
BJORKLUND IN SUPPORT OF  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

Minneapolis Police Officers Russell  
Cragin, Anthony Rodin, Michael Grahn,  
Angelo Fossum, Stephen McCarty, and  
Gerald Moore; Minneapolis Chief of Police  
Janeé Hareau; City of Minneapolis;  
Andrew Hodynsky; SMG; Minnesota  
Sports Facilities Authority; Minnesota  
Vikings Football Stadium, LLC; and  
Minnesota Vikings Football Club, LLC,

Defendant.

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I, Shannon L. Bjorklund, state and declare as follows:

1. I am licensed to practice law in the State of Minnesota and am an attorney at Dorsey & Whitney LLP.
2. I represent the Minnesota Sports Facilities Authority (“MSFA”) with respect to this litigation. The MSFA is a political subdivision created by Minnesota statute.
3. Since service of this complaint, the MSFA has taken reasonable steps to ascertain any insurance coverage and defense obligations, and to determine its legal representation for this action.

4. Up through the morning of June 20, 2017, the MSFA believed that full agreement had been reached on defense obligations under the operative agreements.

5. This morning the MSFA learned that there was an apparent misunderstanding about the respective roles and duties. The MSFA has been unable to resolve this issue at this point.

6. Accordingly, Dorsey & Whitney LLP was instructed today to represent the MSFA in this litigation. Dorsey & Whitney LLP represents the MSFA with respect to other matters.

7. A two-week extension is necessary for the MSFA's counsel to prepare an adequate response to the Complaint.

8. This motion is filed before the response to the Complaint is due, in good faith and not for the purpose of unwarranted delay

9. There have been no prior extensions in this case.

10. Plaintiff provided a copy of the Complaint to the MSFA on May 31, 2017, more than six weeks after the Complaint was filed.

11. I have been informed by counsel for SMG that Plaintiff's counsel refused to grant an extension requested by SMG.

12. I called Mr. Martinez, counsel for Plaintiff, shortly before 11 am today, June 20. I spoke to the person who answered the phone, Jasmine, and informed her that the MSFA seeks a two-week extension. I also informed her of the rush nature of the request, and politely requested a return phone call as soon as practicable. She informed

me that Mr. Martinez was recovering from health issues but working remotely. As of the filing of this declaration, I have not received a return phone call.

13. I called Mr. Nadimi, counsel for Plaintiff, shortly after 1 pm today. I left a voicemail requesting a two-week extension and a return phone call. As of the filing of this declaration, I have not received a return phone call.

14. I will meet and confer with counsel for Plaintiff as soon as possible and file the requisite Meet and Confer statement pursuant to Local Rule 7.1.

I declare under penalty of perjury under the laws of the Unites States of America that the foregoing is true and correct.

Dated: June 20, 2017.

s/ Shannon L. Bjorklund

Shannon L. Bjorklund